

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF PENNSYLVANIA

3 -----X
4 NATIONAL HEALTHCARE SERVICES, : CIVIL ACTION
5 INC., :
6 Plaintiff, : NO. 02-CV-3600
7 : (MM)
8 VS. :
9 :
10 PENN TREATY AMERICAN :
11 CORPORATION, et al., :
12 Defendants. :
13 -----X

14 Videotaped deposition of
15 MICHAEL J. CALLAHAN, held at the law
16 offices of BALLARD, SPAHR, ANDREWS &
17 INGERSOLL, LLP, 1735 Market Street, 51st
18 Floor, Philadelphia, Pennsylvania 19103,
19 on Wednesday, October 15, 2003, beginning
20 at 9:09 a.m., before Debra J. Weaver, a
21 Federally Approved Registered
22 Professional Reporter, Certified Realtime
23 Reporter and Certified Shorthand Reporter
24 of NJ (No. XI 01614) and Delaware (No.
138-RPR, Expiration 1/13/05).

Job No: 153616



COPY

1 break.

2 MS. SPECTOR: Okay.

3 THE VIDEOGRAPHER: Stand by.

4 The time is 3:57 p.m. Off the
5 record.

6 (Off the record.)

7 THE VIDEOGRAPHER: The time
8 is 4:00 p.m. We are back on the
9 record.

10 BY MR. RIVERA-SOTO:

11 Q. Mr. Callahan, are you now or
12 have you ever been an officer of National
13 Healthcare Services?

14 A. No.

15 Q. Are you now or have you ever
16 been a director of National Healthcare
17 Services?

18 A. No.

19 Q. Are you now or have you ever
20 been in management charge of National
21 Healthcare Services?

22 MS. SPECTOR: Objection.

23 THE WITNESS: No.

24 BY MR. RIVERA-SOTO:

1 Q. Have you at any time
2 communicated to anyone at Penn Treaty
3 that you are either an officer, director
4 or in management charge of National
5 Healthcare Services?

6 MS. SPECTOR: Objection.

7 THE WITNESS: No.

8 BY MR. RIVERA-SOTO:

9 Q. Has anyone at Penn Treaty
10 ever asked you if you are an officer,
11 director or in management charge of
12 National Healthcare Services?

13 A. No.

14 Q. To your knowledge, has Penn
15 Treaty ever asked anybody whether you
16 were an officer, director or in
17 management charge of National Healthcare
18 Services?

19 MS. SPECTOR: Objection.

20 THE WITNESS: Not to my
21 knowledge, no.

22 BY MR. RIVERA-SOTO:

23 Q. To your knowledge, did you
24 ever represent to anybody -- not to your